

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW HAMPSHIRE**

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|--------------------------|---|------------------------|
| In Re: Michael Guglielmo | * |                        |
|                          | * | Case No.: 22-10461-BAH |
|                          | * | Chapter 13             |
| Debtor                   | * |                        |
|                          | * |                        |

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**OBJECTION TO CONFIRMATION**

**NOW COMES** Christina Snarski, a Creditor in the above-captioned matter, by and through her Attorneys, Raymond J. DiLucci, P.A., and Object to Confirmation of the Chapter 13 Plan as filed by the Debtor, Michael Guglielmo, and in support thereof says:

1. That on or about January 12, 2007, the Debtor, Michael Guglielmo (“Guglielmo”) and the Creditor, Christina Snarski, fka Christina Poulicako (“Snarski”) purchased residential real estate located at 132 Park St., Northfield, NH (“the property”) as Tenants in Common.
2. That the purchase of the property was financed by a loan granted solely to Snarski.
3. That both Guglielmo and Snarski granted a mortgage on the property in exchange for the loan to Snarski to purchase the property.
4. That the relationship between Guglielmo and Snarski ended.
5. That during the COVID-19 pandemic, Guglielmo contacted the servicer of the loan in Snarski’s name and requested a “Covid forbearance”. Guglielmo requested further forbearances due to Covid as well; however, upon information and belief, Guglielmo continued to receive rental income from the tenants of the property during the foreclosure and eviction moratoriums in place because of Covid-19.
6. That eventually, a Power of Sale Foreclosure was scheduled to occur due to the non-payment of the loan.
7. That on or about September 21, 2022, Guglielmo filed a Voluntary Chapter 13 Bankruptcy Petition at the Bankruptcy Court for the District of New Hampshire and received Case No.: 22-10461-BAH, thus, staying the Power of Sale Foreclosure on the property.
8. That on or about September 22, 2022, Guglielmo filed his Chapter 13 Plan of Reorganization (“the plan”).
9. That pursuant to Paragraph 13 of the plan, Guglielmo proposes to enter a consensual loan modification with Nationstar mortgage for the delinquent loan payments on the property.
10. That Snarski objects to the proposed treatment of the Nationstar mortgage as the loan is solely in her name.
11. That Snarski will not participate in any modification attempts that will result in her continued liability to Nationstar, or such other entity as may receive the right to service the loan, for the loan on the

property.

**WHEREFORE** the Creditor, Christina Snarski, respectfully requests this Honorable Court:

- A Deny Confirmation of the Chapter 13 Plan; and;
- B. And for such other and further relief as may be deemed fair, just and equitable.

Respectfully Submitted,  
Christina Snarski  
By and Through her Attorneys,

Dated: November 4, 2022

/s/ Kathleen E. McKenzie, Esq.  
Kathleen E. McKenzie, Esquire  
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